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MAR 08 2012

State Grand Jury Judge

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MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(1)

Superior Court
Docket Number 12-03-00036-S

STATE OF NEW JERSEY)

v.)

TERRY E. DILLIGARD II)

MONIQUE VALENTINE)

and)

TERRY DILLIGARD)

INDICTMENT

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Conspiracy - Second Degree)

TERRY E. DILLIGARD II

and

MONIQUE VALENTINE

between on or about August 27, 2006, and on or about November 9,
2010, at the City of Trenton, in the County of Mercer, at the
City of Newark, in the County of Essex, elsewhere, and within the
jurisdiction of this Court, with the purpose of promoting or
facilitating the commission of the crimes of theft by deception
and financial facilitation, did agree that:

A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or

B. One or more of them would aid in the planning, solicitation or commission of said crimes, that is:

1. Purposely to commit theft by obtaining property of another by deception, contrary to the provisions of N.J.S.A. 2C:20-4.

2. Knowingly to transport or possess property known to be derived from criminal activity or to engage in transactions involving property knowing or which a reasonable person would believe was derived from criminal activity knowing that the transaction was designed in whole or part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25b.

The Grand Jurors aforesaid, upon their oaths, do further present that:

It was part of said conspiracy that TERRY E. DILLIGARD II and MONIQUE VALENTINE did assist each other in fraudulently applying for, and receiving unemployment insurance benefits in the names of Angelique Belton, Pamela Dawson, Roycelynn Gunn, Cleara Johnson, Tommy Mosely, Romond Phillips, Jhondra Robinson, Keith Schenck, Tevin Strickland, Sabrina Waldron, Cheryl Warren,

Frazier Williams, and Felicia Williams, from the New Jersey Department of Labor and Workforce Development.

It was also part of said conspiracy that TERRY E. DILLIGARD II and MONIQUE VALENTINE did receive said unemployment insurance benefits to which they were not entitled and divided the benefits between themselves.

All in violation of the provisions of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Theft By Deception - Second Degree)

TERRY E. DILLIGARD II

and

MONIQUE VALENTINE

between on or about August 27, 2006, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of the State of New Jersey, having an aggregate value of \$75,000 or more, by deception, that is, the said TERRY E. DILLIGARD II and MONIQUE VALENTINE did purposely obtain unemployment insurance benefits, in an aggregate amount of approximately \$478,768, by submitting or causing to be submitted applications for unemployment insurance benefits to the State of New Jersey in the names of Angelique Benton, Pamela Dawson, Roycelynn Gunn, Cleara Johnson, Tommy Mosely, Romond Phillips, Jhondra Robinson, Keith Schenck, Tevin Strickland, Sabrina Waldron, Cheryl Warren, Frazier Williams, and Felicia Williams, thereby creating or reinforcing the false impressions to the State of New Jersey that these individuals had been employed by employers listed in said unemployment insurance applications during the time periods indicated, that they had earned certain wages, and were thereby

entitled to collect unemployment insurance benefits from the State of New Jersey;

WHEREAS IN TRUTH AND IN FACT, as the said TERRY E. DILLIGARD II and MONIQUE VALENTINE then and there well knew, said persons were not employed by the employers listed in said unemployment insurance applications during the time periods indicated, nor had they earned the wages indicated, and were thereby not entitled to collect said unemployment insurance benefits from the State of New Jersey, all contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1) (a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft By Deception - Second Degree)

TERRY E. DILLIGARD II

between on or about November 19, 2006, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of the State of New Jersey having an aggregate value of \$75,000 or more, by deception, that is, the said TERRY E. DILLIGARD II, did purposely obtain unemployment insurance benefits in an aggregate amount of approximately \$810,345, by submitting or causing to be submitted applications for unemployment insurance benefits to the State of New Jersey in the names of Kianah Barber, Leon Belton, Juvaughn Bonney, Antoine Boone, Paul Braswell, Wakir Bryant, Darrin Cheeks, Ronald Coleman, Robert Gandy, Ryan Garnes, Khalif Grant, Pamela Green, Tony Hardiman, Brenda Harvey, James Harvey, Ronald Hobbs, Robert Jackson, Troy James, Cortina Johnson, Samaad Mathis, Marquise McDougale, Michelle Parker, Catherine Plaza, Gregory Purnell, John Ramsey, Raphael Reddick, Doel Rodriguez, Brian Ross, James Seawright, Rodriguez Sharpe, Robert Shein, Harold Sorrells, Jabril Stokes, Dorian Strickland, Michelle Tarry, Mark Valvano, Adrienne Warren, Kali Warren, Karriem Warren, Rasjhon Warren, Evan Davis Weems, Joseph Williams, Pamela Worts, and Tina Young, thereby creating or reinforcing the false

impressions to the State of New Jersey that these individuals had been employed by employers listed in said unemployment insurance applications during the time periods indicated, that they had earned certain wages, and were thereby entitled to collect unemployment insurance benefits from the State of New Jersey;

WHEREAS IN TRUTH AND IN FACT, as the said TERRY E. DILLIGARD II, then and there well knew, said persons were not employed by the employers listed in said unemployment insurance applications during the time periods indicated, nor had they earned the wages indicated, and were thereby not entitled to collect said unemployment insurance benefits from the State of New Jersey, all contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Theft By Deception - Third Degree)

MONIQUE VALENTINE

between on or about March 16, 2008, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of the State of New Jersey, having an aggregate value of greater than \$500, by deception, that is, the said MONIQUE VALENTINE purposely did obtain unemployment insurance benefits, in an aggregate amount of approximately \$25,450, by submitting or causing to be submitted applications for unemployment insurance benefits to the State of New Jersey in the names of Jamie Campbell and Annette Jeter, thereby creating or reinforcing the false impressions to the State of New Jersey that these individuals had been employed by employers listed in said unemployment insurance applications during the time periods indicated, that they had earned certain wages, and were thereby entitled to collect unemployment insurance benefits from the State of New Jersey;

WHEREAS IN TRUTH AND IN FACT, as the said MONIQUE VALENTINE then and there well knew, said persons were not employed by the employers listed in said unemployment insurance applications during the time periods indicated, nor had they earned the wages indicated, and were thereby not entitled to collect said

unemployment insurance benefits from the State of New Jersey, all contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2) (a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Financial Facilitation, Possession of Property Derived
From Criminal Activity - Second Degree)

TERRY E. DILLIGARD II

and

MONIQUE VALENTINE

between on or about August 27, 2006, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did transport or possess property in an amount of \$75,000 or more, knowing or which a reasonable person would believe to be derived from criminal activity, that is, the said TERRY E. DILLIGARD II and MONIQUE VALENTINE did possess property in an amount of approximately 386,189, which they well knew was derived from a scheme to defraud the State of New Jersey of unemployment insurance benefits, more specifically, unemployment insurance benefits for claims in the names of Angelique Belton, Pamela Dawson, Roycelynn Gunn, Cleara Johnson, Tommy Mosely, Romond Phillips, Jhondra Robinson, Keith Schenck, Tevin Strickland, Sabrina Waldron, Cheryl Warren, Frazier Williams, and Felicia Williams, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Conspiracy - Second Degree)

TERRY E. DILLIGARD II

and

TERRY DILLIGARD

between on or about June 21, 2009, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, at the State of Florida, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of identity theft, theft by deception and financial facilitation, did agree that:

A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or

B. One or more of them would aid in the planning, solicitation or commission of said crimes, that is:

1. With purpose to obtain a benefit for themselves or another or to injure or defraud another, to impersonate another or assume a false identity and commit an act in such assumed character or false identity, contrary to the provisions of N.J.S.A. 2C:21-17a(1).

2. Purposely to commit theft by obtaining property of another by deception, contrary to the provisions of N.J.S.A. 2C:20-4.

3. Knowingly to transport or possess property known to be derived from criminal activity or to engage in transactions involving property knowing or which a reasonable person would believe was derived from criminal activity knowing that the transaction was designed in whole or part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:21-25b.

The Grand Jurors aforesaid, upon their oaths, do further present that:

It was part of said conspiracy that TERRY DILLIGARD obtained names and personal identifying information of residents of Florida, including registered voters, namely, Chrystan Clark, Nicole Davis, James Gordon, Clifford Lewis, Andrea Lyles, Edgar Shipman, Leticia Starke, Felicia Williams, and Larry Williams, and provided such information to TERRY E. DILLIGARD II.

It was part of said conspiracy that TERRY E. DILLIGARD II used this information to fraudulently apply for unemployment insurance benefits in these names from the New Jersey Department of Labor and Workforce Development.

It was also part of this conspiracy that TERRY E. DILLIGARD II sent payments to TERRY DILLIGARD as compensation for providing the names and identifying information.

All in violation of the provisions of N.J.S.A. 2C:5-2, and
against the peace of this State, the government and dignity of
the same.

COUNT SEVEN

(Identity Theft - Second Degree)

TERRY E. DILLIGARD II

and

TERRY DILLIGARD

between on or about June 21, 2009, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, at the State of Florida, elsewhere, and within the jurisdiction of this Court, with purpose to obtain a benefit for themselves or another in an amount of \$75,000 or more, or to injure or defraud another, did impersonate five or more persons or assume five or more false identities and do acts in such assumed characters or false identities, that is, that said TERRY E. DILLIGARD II and TERRY DILLIGARD did impersonate or assume the identities of Chrystan Clark, Nicole Davis, James Gordon, Clifford Lewis, Andrea Lyles, Edgar Shipman, Leticia Starke, Felicia Williams, and Larry Williams, and file for and collect unemployment insurance benefits in an aggregate amount of approximately \$174,848 in these names from the State of New Jersey, contrary to the provisions of N.J.S.A. 2C:21-17(a) (1), N.J.S.A. 2C:21-17(c) (3), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Theft By Deception - Second Degree)

TERRY E. DILLIGARD II

and

TERRY DILLIGARD

between on or about June 21, 2009, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, at the State of Florida, elsewhere, and within the jurisdiction of this Court, purposely did obtain property of the State of New Jersey having an aggregate value of \$75,000 or more, by deception, that is, the said TERRY E. DILLIGARD II and TERRY DILLIGARD did purposely obtain unemployment insurance benefits in an aggregate amount of approximately \$174,848 by submitting or causing to be submitted applications for unemployment insurance benefits to the State of New Jersey in the names of Chrystan Clark, Nicole Davis, James Gordon, Clifford Lewis, Andrea Lyles, Edgar Shipman, Leticia Starke, Felicia Williams, and Larry Williams, thereby creating or reinforcing false impressions to the State of New Jersey that these individuals had been employed by employers listed in said unemployment insurance applications during the time periods indicated, that they had earned certain wages, and were thereby entitled to collect unemployment insurance benefits from the State of New Jersey;

WHEREAS IN TRUTH AND IN FACT, as the said TERRY E. DILLIGARD II and TERRY DILLIGARD, then and there well knew, said persons were not employed by the employers listed in said unemployment insurance applications during the time periods indicated, nor had they earned the wages indicated, and were thereby not entitled to collect said unemployment insurance benefits from the State of New Jersey, all contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Financial Facilitation, Possession of Property Derived
From Criminal Activity - Third Degree)

TERRY DILLIGARD

between on or about May 20, 2010, and on or about July 14, 2010,
at the City of Trenton, in the County of Mercer, at the City of
Newark, in the County of Essex, at the State of Florida,
elsewhere, and within the jurisdiction of this Court, did
transport or possess property knowing or which a reasonable
person would believe to be derived from criminal activity, that
is, the said TERRY DILLIGARD did possess money, that is,
approximately \$12,913, which he well knew was derived from a
scheme to defraud the State of New Jersey of unemployment
insurance benefits, more specifically, United States Postal
Service money orders purchased with fraudulently obtained
unemployment insurance benefits for claims in the names of
Chrystan Clark, Nicole Davis, James Gordon, Clifford Lewis,
Andrea Lyles, Edgar Shipman, Leticia Starke, Felicia Williams,
and Larry Williams, contrary to the provisions of N.J.S.A. 2C:21-
25a and N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT TEN

(Financial Facilitation, Possession of Property Derived
From Criminal Activity - First Degree)

TERRY E. DILLIGARD II

between on or about March 11, 2007, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, at the State of Florida, elsewhere, and within the jurisdiction of this Court, did transport or possess property in an amount of \$500,000 or more, knowing or which a reasonable person would believe to be derived from criminal activity, that is, said TERRY E. DILLIGARD II did possess property in an amount of approximately \$560,856, which he knew was derived from a scheme to defraud the State of New Jersey of unemployment insurance benefits, more specifically unemployment insurance benefits for claims in the names of Kianah Barber, Leon Belton, Juvaugh Bonney, Paul Braswell, Wakir Bryant, Darrin Cheeks, Chrystan Clark, Ronald Coleman, Nicole Davis, Robert Gandy, James Gordon, Pamela Green, Brenda Harvey, James Harvey, Tony Hardiman, Robert Jackson, Troy James, Courtney Johnson, Clifford Lewis, Andrea Lyles, Samaad Mathis, Marquise McDougale, Michelle Parker, Catherine Plaza, Gregory Purnell, John Ramsey, Raphael Reddick, Doel Rodriguez, Rodriguez Sharpe, James Seawright, Robert Shein, Edgar Shipman, Harold Sorrells, Leticia Starke, Dorian Strickland, Tevin Strickland, Michelle Tarry, Mark Valvano, Adrienne Warren, Rasjhon Warren, Evan Davis Weems,

Joseph Williams, Larry Williams, Tianna Woolfolk and Pamela Worts, contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

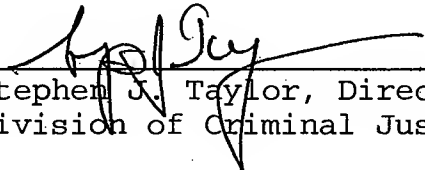
COUNT ELEVEN

(Financial Facilitation, Engaging in Transactions for
the Purpose of Disguising the Nature of the
Transaction - First Degree)

TERRY E. DILLIGARD II

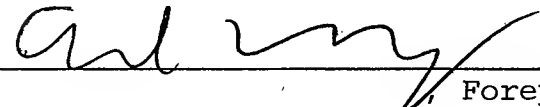
between on or about August 27, 2006, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did engage in transactions involving property, in an amount of \$500,000 or more, knowing or which a reasonable person would believe, was derived from criminal activity knowing that the transaction was designed in whole or part to conceal or disguise the nature, location, source, ownership or control of the property derived from criminal activity, that is, the said TERRY E. DILLIGARD II did deposit unemployment insurance benefits, in an amount of approximately \$729,042, for claims in the names of Leon Belton, Angelique Belton, Paul Braswell, Wakir Bryant, Darrin Cheeks, Chrystan Clark, Ronald Coleman, Nicole Davis, Pamela Dawson, Robert Gandy, James Gordon, Pamela Green, Roycelynn Gunn, Brenda Harvey, James Harvey, Tony Hardiman, Robert Jackson, Troy James, Cleara Johnson, Courtney Johnson, Clifford Lewis, Andrea Lyles, Tommy Mosely, Romond Phillips, Gregory Purnell, John Ramsey, Raphael Reddick, Jhondra Robinson, Doel Rodriguez, Keith Schenck, James Seawright, Robert Shein, Edgar Shipman, Harold Sorrells, Leticia

Starke, Dorian Strickland, Michelle Tarry, Mark Valvano, Sabrina Waldron, Adrienne Warren, Cheryl Warren, Felicia Williams, Frazier Williams, Joseph Williams, Larry Williams, and Pamela Worts, into bank accounts in names other than his own, contrary to the provisions of N.J.S.A. 2C:21-25b(1), N.J.S.A. 2C:21-25b(2) (a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Dated: 3/1/12

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MAR 01 2012

Judge Pedro J. Jimenez, Jr.

FILED

MAR 08 2012 SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury Judge

State Grand Jury

Number SGJ614-11-15(1)

Superior Court

Docket Number 12-03-00036-S

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

TERRY E. DILLIGARD II)

TERRY DILLIGARD)


and)

MONIQUE VALENTINE)

An Indictment having been returned to this Court by the
State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012,
pursuant to paragraph 8 of the State Grand Jury Act, that the
County of Mercer be and hereby is designated as the County of venue
for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court
shall transmit forthwith the Indictment in this matter and a
certified copy of this Order to the Criminal Division Manager of
the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(3)

Superior Court

Docket Number 2-03-00034-S

STATE OF NEW JERSEY)

v.)

JANICE DILLIGARD)

JANICE ALLEN)

EMEKA OBIRI-IBE)

GEORGE DONONCOURT)

GEORGE ROSS)

FLOYD ROBERSON)

and)

TERRELL EVANS)

INDICTMENT

FILED

MAR 08 2012

State Grand Jury Judge

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Conspiracy - Second Degree)

JANICE DILLIGARD

JANICE ALLEN

EMEKA OBIRI-IBE

GEORGE DONONCOURT

GEORGE ROSS

FLOYD ROBERSON

and

TERRELL EVANS

between on or about August 19, 2007, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the crimes of theft by deception and theft by unlawful taking, did agree that:

A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or

B. One or more of them would aid in the planning, solicitation or commission of said crimes, that is:

1. Purposely to commit theft by obtaining property of another by deception, contrary to the provisions of N.J.S.A. 2C:20-4, and

2. Purposely to unlawfully take or exercise unlawful control over movable property of another with purpose to deprive, contrary to the provisions of N.J.S.A. 2C:20-3.

The Grand Jurors aforesaid, upon their oaths, do further present that:

It was part of said conspiracy that JANICE DILLIGARD, JANICE ALLEN, EMEKA OBIRI-IBE, GEORGE DONONCOURT, GEORGE ROSS, FLOYD ROBERSON and TERRELL EVANS assisted each other in fraudulently applying for, and receiving unemployment insurance benefits, in

the names of Aliah Bey, Romana Brison, Olivia Brynlsen, Kayla Cord, Mary Hilbert, Martha Jean, Deborah Jefferies, Dorothy Lewis, Kristen Manso, Zakea Miles, Michelle Parker, Dana Robinson, Josephine Spain, Denise Spencer, Barbara Tomonia, Zhaniyah Ward, Rashona Williams, and Tianna Woolfolk, from the New Jersey Department of Labor and Workforce Development.

It was also part of said conspiracy that JANICE DILLIGARD, JANICE ALLEN, EMEKA OBIRI-IBE, GEORGE DONONCOURT, GEORGE ROSS, FLOYD ROBERSON and TERRELL EVANS received said unemployment insurance benefits and divided the benefits between themselves.

All in violation of the provisions of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Theft By Deception - Second Degree)

JANICE DILLIGARD

and

JANICE ALLEN

between on or about August 19, 2007, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of the State of New Jersey, having an aggregate value of \$75,000 or more, by deception, that is, the said JANICE DILLIGARD and JANICE ALLEN did purposely obtain unemployment insurance benefits, in an approximate amount of \$585,304, by submitting or causing to be submitted applications for unemployment insurance benefits to the State of New Jersey in the names of Aliah Bey, Romana Brison, Olivia Brynildsen, Kayla Cord, Mary Hilbert, Martha Jean, Deborah Jefferies, Dorothy Lewis, Kristen Manso, Zakea Miles, Michelle Parker, Dana Robinson, Josephine Spain, Denise Spencer, Barbara Tomonia, Zhaniyah Ward, Rashona Williams, and Tianna Woolfolk, and thereby creating or reinforcing false impressions to the State of New Jersey that these individuals had been employed by employers listed in said unemployment insurance applications during the time periods indicated, that they had earned certain

wages, and were thereby entitled to collect unemployment insurance benefits from the State of New Jersey;

WHEREAS IN TRUTH AND IN FACT, as the said JANICE DILLIGARD and JANICE ALLEN then and there well knew, said persons were not employed by the employers listed in said unemployment insurance applications during the time periods indicated, nor had they earned the wages indicated, and were thereby not entitled to collect unemployment insurance benefits from the State of New Jersey, all contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(1) (a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft By Deception - Third Degree)

JANICE ALLEN

between on or about January 14, 2007, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of the State of New Jersey, having an aggregate value of greater than \$500, by deception, that is, the said JANICE ALLEN did purposely obtain unemployment insurance benefits by submitting or causing to be submitted applications for unemployment insurance benefits to the State of New Jersey in the names of Annette Jeter, Evelyn Peoples, Tevin Strickland, and Juanita Williams, thereby creating or reinforcing the false impressions to the State of New Jersey that these individuals had been employed by employers listed in said unemployment insurance applications during the time periods indicated, that they had earned certain wages, and were thereby entitled to collect unemployment insurance benefits from the State of New Jersey;

WHEREAS IN TRUTH AND IN FACT, as the said JANICE ALLEN then and there well knew, said persons were not employed by the employers listed in said unemployment insurance applications during the time periods indicated, nor had they earned the wages indicated, and were thereby not entitled to collect unemployment

insurance benefits from the State of New Jersey, all contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Theft by Unlawful Taking - Third Degree)

EMEKA OBIRI-IBE

between on or about June 17, 2008, and on or about June 21, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over the movable property of the State of New Jersey, in an amount in excess of \$500, that is, unemployment insurance benefits in the aggregate amount of approximately \$8,989, payable to Deborah Jefferies, Denise Spencer, Keith Schenck, Josephine Spain, Zhaniyah Ward, and Tianna Woolfolk, with purpose to deprive, contrary to the provisions of N.J.S.A. 2C:20-3, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Theft by Unlawful Taking - Third Degree)

GEORGE DONONCOURT

between on or about February 15, 2010, and on or about May 21, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over the movable property of the State of New Jersey, in an amount in excess of \$500, that is, unemployment insurance benefits in the aggregate amount of approximately \$11,286, payable to Olivia Brynlsen, Kayla Cord, Mary Hilbert, Martha Jean, Zhaniyah Ward, and Tianna Woolfolk, and with purpose to deprive, contrary to the provisions of N.J.S.A. 2C:20-3, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Theft by Unlawful Taking - Third Degree)

GEORGE ROSS

between on or about June 16, 2008, and on or about January 8, 2009, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over the movable property of the State of New Jersey, in an amount in excess of \$500, that is, unemployment insurance benefit checks in the aggregate amount of approximately \$49,045, that is, unemployment insurance benefits payable to Olivia Brynildsen, Kayla Cord, Roycelynn Gunn, Mary Hilbert, Martha Jean, Dorothy Lewis, Zakea Miles, Michelle Parker, Jhondra Robinson, Dorian Strickland, Tevin Strickland, Zhaniyah Ward, Rashona Williams, and Tianna Woolfolk, with purpose to deprive, contrary to the provisions of N.J.S.A. 2C:20-3, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Theft by Unlawful Taking - Third Degree)

FLOYD ROBERSON

between on or about July 21, 2008, and on or about September 3, 2008, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over the movable property of the State of New Jersey, in an amount in excess of \$500, that is, unemployment insurance benefits in the aggregate amount of approximately \$3,360, payable to Olivia Brynildsen and Michelle Parker, with purpose to deprive, contrary to the provisions of N.J.S.A. 2C:20-3, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Theft by Unlawful Taking - Third Degree)

TERRELL EVANS

between on or about July 7, 2008, and on or about December 31, 2008, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did unlawfully take or exercise unlawful control over the movable property of the State of New Jersey, in an amount in excess of \$500, that is, unemployment insurance benefits in the aggregate amount of approximately \$16,576, payable to Olivia Brynildsen, Martha Jean, Deborah Jefferies, Dorothy Lewis, Michelle Parker, and Zhaniyah Ward, with purpose to deprive, contrary to the provisions of N.J.S.A. 2C:20-3, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Financial Facilitation, Possession of Property Derived
From Criminal Activity - Second Degree)

JANICE DILLIGARD

and

JANICE ALLEN

between on or about February 11, 2007, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did transport or possess property with a value in excess of \$75,000, knowing or which a reasonable person would believe to be derived from criminal activity, that is, said JANICE DILLIGARD and JANICE ALLEN did possess approximately \$374,336, which she well knew was derived from a scheme to defraud the State of New Jersey of unemployment insurance benefits, more specifically unemployment insurance benefits for claims in the names of Aliah Bey, Romana Brison, Olivia Brynildsen, Kayla Cord, Mary Hilbert, Martha Jean, Deborah Jefferies, Dorothy Lewis, Kristen Manso, Zakea Miles, Michelle Parker, Dana Robinson, Josephine Spain, Denise Spencer, Barbara Tomonia, Zhaniyah Ward, Rashona Williams, and Tianna Woolfolk, and contrary to the provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

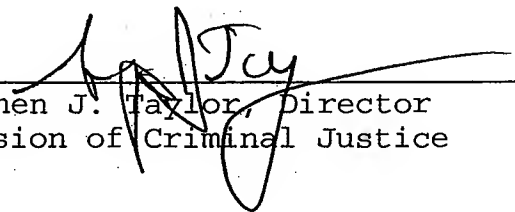
COUNT TEN

(Financial Facilitation, Possession of Property Derived
From Criminal Activity - Third Degree)

JANICE ALLEN

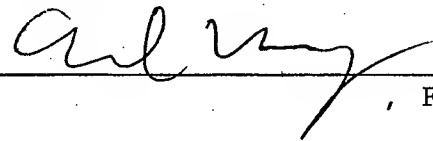
between on or about January 14, 2007, and on or about November 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did transport or possess property, knowing or which a reasonable person would believe to be derived from criminal activity, that is, said JANICE ALLEN did possess money which she well knew was derived from a scheme to defraud the State of New Jersey of unemployment insurance benefits, more specifically unemployment insurance benefits for claims in the names of Martha Jean, Michelle Parker, Juanita Williams, Tevin Strickland, Annette Jeter and Evelyn Peoples, and contrary to the

provisions of N.J.S.A. 2C:21-25a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:


_____, Foreperson

Dated: 3/1/12

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(3)

Superior Court

Docket Number 12-03-00034-S

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

JANICE DILLIGARD)

JANICE ALLEN)

EMEKA OBIRI-IBE)

GEORGE DONONCOURT)

GEORGE ROSS)

FLOYD ROBERSON)

and)

TERRELL EVANS)

FILED


MAR 08 2012

State Grand Jury Judge

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(6)

Superior Court

Docket Number 12-03-00042-S

STATE OF NEW JERSEY)

v.)

LEONDREAU BELTON)

INDICTMENT

FILED

MAR 08 2012

State Grand Jury Judge

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

LEONDREAU BELTON

between on or about December 13, 2009, and on or about September
11, 2010, at the City of Trenton, in the County of Mercer, at the
City of Newark, in the County of Essex, at the Township of
Hillside, in the County of Union, elsewhere, and within the
jurisdiction of this Court, did purposely obtain property of the
State of New Jersey, having a value in excess of \$500, by
deception, by creating or reinforcing a false impression that he
had previously been employed by Newark Beth Israel Medical Center
and was entitled to receive unemployment insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said LEONDREAU BELTON
then and there well knew, he had never been employed by or
received wages from Newark Beth Israel Medical Center and was
therefore not entitled to unemployment insurance benefits,

contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

LEONDREAU BELTON

on or about August 24, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, at the Township of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 73109895, dated August 19, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 3/1/12

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(6)

Superior Court

Docket Number 12 - 03 - 00042 - S

STATE OF NEW JERSEY)

v.)

LEONDREAU BELTON)

ORDER OF VENUE

FILED

MAR 08 2012

State Grand Jury Judge

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

FILED

RECEIVED

MAR 08 2012

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

MAR 01 2012

State Grand Jury Judge

State Grand Jury

Number SGJ614-11-15(7)

Superior Court

Docket Number 12-03-00043-8

Judge Pedro J. Jimenez, Jr

STATE OF NEW JERSEY)

v.)

INDICTMENT

JUVAUGHN BONNEY)

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

JUVAUGHN BONNEY

between on or about March 29, 2009, and on or about September 11,
2010, at the City of Trenton, in the County of Mercer, at the
City of Newark, in the County of Essex, elsewhere, and within the
jurisdiction of this Court, did purposely obtain property of the
State of New Jersey, having a value in excess of \$500, by
deception, by creating or reinforcing a false impression that he
had previously been employed by Newark Beth Israel Medical Center
and was entitled to receive unemployment insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said JUVAUGHN BONNEY
then and there well knew, he had never been employed by or
received wages from Newark Beth Israel Medical Center and was
therefore not entitled to unemployment insurance benefits,
contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-

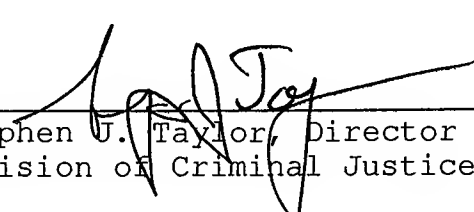
2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

JUVAUGHN BONNEY

on or about April 22, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 69183536, dated April 19, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date:

3/1/11

FILED

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

MAR 08 2012

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(7)

Superior Court

Docket Number

12-03-00043-S

STATE OF NEW JERSEY

v.


JUVAUGHN BONNEY

ORDER OF VENUE

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(8)

Superior Court

Docket Number 12-03-00044-S

STATE OF NEW JERSEY)

v.)

ANTOINE BOONE)

FILED

INDICTMENT

MAR 08 2012

State Grand Jury Judge

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

ANTOINE BOONE

between on or about September 20, 2009, and on or about September 11, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, at the Township of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of the State of New Jersey, having a value in excess of \$500, by deception, by creating or reinforcing a false impression that he had previously been employed by the University of Medicine and Dentistry of New Jersey and was entitled to receive unemployment insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said ANTOINE BOONE then and there well knew, he had never been employed by or received wages from the University of Medicine and Dentistry of New Jersey

and was therefore not entitled to unemployment insurance benefits, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

ANTOINE BOONE

on or about December 17, 2009, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, at the Township of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 64635956, dated December 15, 2009, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date:

3/1/12

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(8)

Superior Court

Docket Number 12-03-00044-S

STATE OF NEW JERSEY)

v.)

ANTOINE BOONE)

ORDER OF VENUE **FILED**

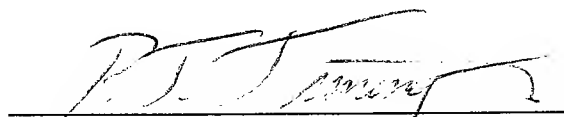
MAR 08 2012

State Grand Jury Judge

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

FILED

MAR 08 2012

SUPERIOR COURT OF NEW JERSEY
State Grand Jury Division - CRIMINAL

State Grand Jury

Number SGJ614-11-15(9)

Superior Court

Docket Number 12-03-00045-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

PAUL BRASWELL)

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

PAUL BRASWELL

between on or about September 20, 2009, and on or about July 24,
2010, at the City of Trenton, in the County of Mercer, at the
City of Newark and the Township of Irvington, both in the County
of Essex, elsewhere, and within the jurisdiction of this Court,
did purposely obtain property of the State of New Jersey, having
a value in excess of \$500, by deception, by creating or
reinforcing a false impression that he had previously been
employed by Adecco USA, Inc. and was entitled to receive
unemployment insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said PAUL BRASWELL then
and there well knew, he had never been employed by or received
wages from Adecco USA, Inc. and was therefore not entitled to
unemployment insurance benefits, contrary to the provisions of

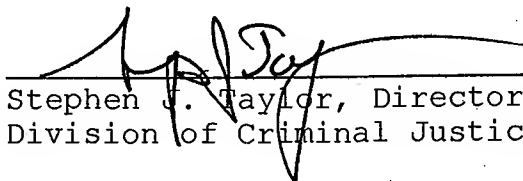
N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2) (a), and N.J.S.A. 2C:2-6,
and against the peace of this State, the government and dignity
of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

PAUL BRASWELL

on or about November 18, 2009, at the City of Trenton, in the County of Mercer, at the City of Newark and the Township of Irvington, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 63611875, dated November 13, 2009, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 3/1/12

FILED

RECEIVED

MAR 08 2012

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

MAR 01 2012

Judge Pedro J. Jimenez, Jr

State Grand Jury

Number SGJ614-11-15(9)

Superior Court

Docket Number 12-03-00045-S

STATE OF NEW JERSEY

)

v.

)

ORDER OF VENUE


PAUL BRASWELL

)

An Indictment having been returned to this Court by the
State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012,
pursuant to paragraph 8 of the State Grand Jury Act, that the
County of Mercer be and hereby is designated as the County of venue
for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court
shall transmit forthwith the Indictment in this matter and a
certified copy of this Order to the Criminal Division Manager of
the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

FILED

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(10)

Superior Court

Docket Number 12-03-00041-8

STATE OF NEW JERSEY)

v.)

INDICTMENT

DARRIN CHEEKS)

The Grand Jurors of and for the State of New Jersey, upon their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

DARRIN CHEEKS

between on or about January 10, 2010, and on or about September 11, 2010, at the City of Trenton, in the County of Mercer, at the City of Elizabeth, in the County of Union, at the City of Newark and the Township of Irvington, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of the State of New Jersey, having a value in excess of \$500, by deception, by creating or reinforcing a false impression that he had previously been employed by the University of Medicine and Dentistry of New Jersey, and was entitled to receive unemployment insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said DARRIN CHEEKS then and there well knew, he had never been employed by or received wages from the University of Medicine and Dentistry of New Jersey

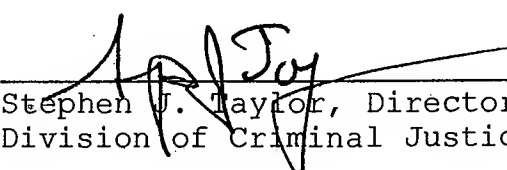
and was therefore not entitled to unemployment insurance benefits, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

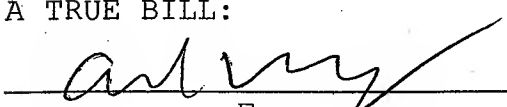
DARRIN CHEEKS

on or about April 9, 2010, at the City of Trenton, in the County of Mercer, at the City of Elizabeth, in the County of Union, at the City of Newark and the Township of Irvington, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 68766329, dated April 6, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 3/1/12

FILED

MAR 08 2012

RECEIVED State Grand Jury Judge SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

MAR 01 2012

State Grand Jury

Number SGJ614-11-15(10)

Judge Pedro J. Jimenez, Jr.

Superior Court
Docket Number

12-03-00047-S

STATE OF NEW JERSEY)

v.)


ORDER OF VENUE

DARRIN CHEEKS)

An Indictment having been returned to this Court by the
State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012,
pursuant to paragraph 8 of the State Grand Jury Act, that the
County of Mercer be and hereby is designated as the County of venue
for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court
shall transmit forthwith the Indictment in this matter and a
certified copy of this Order to the Criminal Division Manager of
the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(11)

Superior Court

Docket Number 12-03-00040-S

STATE OF NEW JERSEY

)

v.

)

RYAN GARNES

)

INDICTMENT

FILED

MAR 08 2012

State Grand Jury Judge

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

RYAN GARNES

between on or about January 18, 2009, and on or about August 7,
2010, at the City of Trenton, in the County of Mercer, at the
City of Newark and the Township of Irvington, both in the County
of Essex, elsewhere, and within the jurisdiction of this Court,
did purposely obtain property of the State of New Jersey, having
a value in excess of \$500, by deception, by creating or
reinforcing a false impression that he had previously been
employed by Adecco USA, Inc., and was entitled to receive
unemployment insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said RYAN GARNES then
and there well knew, he had never been employed by or received
wages from Adecco USA, Inc. and was therefore not entitled to
unemployment insurance benefits, contrary to the provisions of

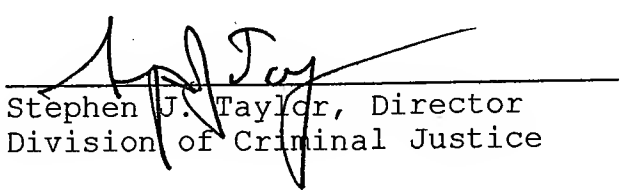
N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6,
and against the peace of this State, the government and dignity
of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

RYAN GARNES

on or about February 24, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark and the Township of Irvington, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 67112186, dated February 22, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 3/1/12

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(11)

Superior Court

Docket Number

12 - 03 - 00040 - S

STATE OF NEW JERSEY)

v.)

RYAN GARNES)

ORDER OF VENUE

FILED

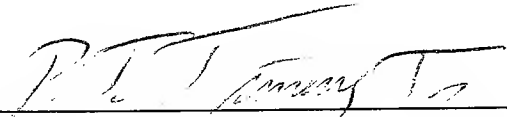
MAR 08 2012

State Grand Jury Judge

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

FILED

MAR 08 2012

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(12)

Superior Court

Docket Number 1-2-03-00059-9

STATE OF NEW JERSEY

)

v.

)

INDICTMENT

KHALIF GRANT

)

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

KHALIF GRANT

between on or about July 18, 2010, and on or about September 11,
2010, at the City of Trenton, in the County of Mercer, at the
City of Newark, in the County of Essex, at the Township of
Hillside, in the County of Union, elsewhere, and within the
jurisdiction of this Court, did purposely obtain property of the
State of New Jersey, having a value in excess of \$500, by
deception, by creating or reinforcing a false impression that he
had previously been employed by the University of Medicine and
Dentistry of New Jersey, and was entitled to receive unemployment
insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said KHALIF GRANT then
and there well knew, he had never been employed by or received
wages from the University of Medicine and Dentistry of New Jersey

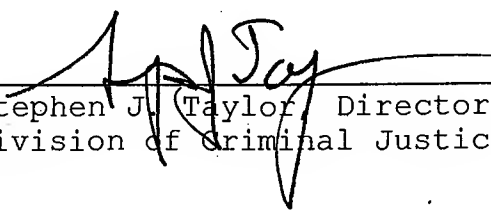
and was therefore not entitled to unemployment insurance benefits, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

KHALIF GRANT

on or about August 23, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, at the Township of Hillside, in the County of Union, elsewhere, and within the jurisdiction of this Court, did knowingly did make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 73109671, dated August 19, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 2/1/12

FILED

MAR 08 2012

RECEIVED State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

MAR 01 2012

Judge Pedro J. Jimenez, Jr

State Grand Jury

Number SGJ614-11-15(12)

Superior Court
Docket Number

12-03-00039-S

STATE OF NEW JERSEY)

v.)

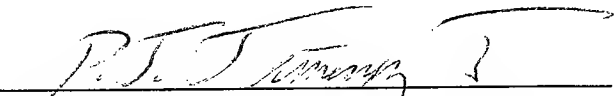
KHALIF GRANT)

ORDER OF VENUE

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(13)

Superior Court

Docket Number

12-03-00038-S
FILED

STATE OF NEW JERSEY)

v.)

INDICTMENT

MAR 08 2012

PAMELA GREEN)

State Grand Jury Judge

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

PAMELA GREEN

between on or about December 13, 2009, and on or about September
11, 2010, at the City of Trenton, in the County of Mercer, at the
City of Newark, in the County of Essex, elsewhere, and within the
jurisdiction of this Court, did purposely obtain property of the
State of New Jersey, having a value in excess of \$500, by
deception, by creating or reinforcing a false impression that she
had previously been employed by the University of Medicine and
Dentistry of New Jersey, and was entitled to receive unemployment
insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said PAMELA GREEN then
and there well knew, she had never been employed by or received
wages from the University of Medicine and Dentistry of New Jersey
and was therefore not entitled to unemployment insurance

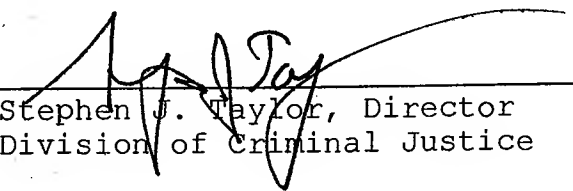
benefits, contrary to the provisions of N.J.S.A. 2C:20-4,
N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the
peace of this State, the government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

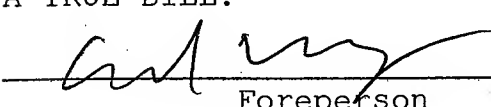
PAMELA GREEN

on or about June 11, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which she did not believe to be true on an Unemployment Insurance Benefit check, number 70798626, dated June 8, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 3/1/12

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

State Grand Jury

Number SGJ614-11-15(13)

Superior Court
Docket Number

12 - 03 - 00038 - S

STATE OF NEW JERSEY)

v.)

PAMELA GREEN)

ORDER OF VENUE

FILED

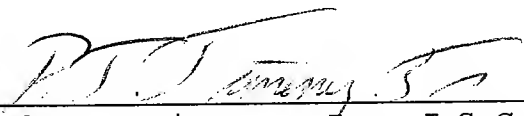
MAR 08 2012

State Grand Jury Judge

An Indictment having been returned to this Court by the
State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012,
pursuant to paragraph 8 of the State Grand Jury Act, that the
County of Mercer be and hereby is designated as the County of venue
for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court
shall transmit forthwith the Indictment in this matter and a
certified copy of this Order to the Criminal Division Manager of
the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

FILED

MAR 08 2012

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

State Grand Jury Judge
SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15-(14)

Superior Court

Docket Number 12-03-00037-S

STATE OF NEW JERSEY

)

v.

)

INDICTMENT

TONY HARDIMAN

)

The Grand Jurors of and for the State of New Jersey, upon their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

TONY HARDIMAN

between on or about July 26, 2009, and on or about July 3, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of the State of New Jersey, having a value in excess of \$500, by deception, by creating or reinforcing a false impression that he had previously been employed by Newark Beth Israel Medical Center, and was entitled to receive unemployment insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said TONY HARDIMAN then and there well knew, he had never been employed by or received wages from Newark Beth Israel Medical Center and was therefore not entitled to unemployment insurance benefits, contrary to the

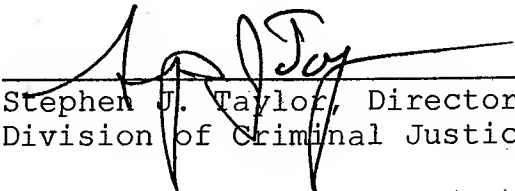
provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and
N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

TONY HARDIMAN

on or about May 28, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 70359441, dated May 25, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date:

3/1/12

FILED

RECEIVED

MAR 03 2012

MAR 01 2012

Judge Pedro J. Jimenez, Jr

State Grand Jury Judge
SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(14)

Superior Court

Docket Number

12-03-00037-S

STATE OF NEW JERSEY

)

v.

)

ORDER OF VENUE


TONY HARDIMAN

)

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(15)

Superior Court

Docket Number 12-03-00046-S

FILED

STATE OF NEW JERSEY)

v.)

RONALD HOBBS)

INDICTMENT MAR 08 2012

State Grand Jury Judge

The Grand Jurors of and for the State of New Jersey, upon their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

RONALD HOBBS

between on or about December 8, 2009, and on or about September 11, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark and the Township of Irvington, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of the State of New Jersey, having a value in excess of \$500, by deception, by creating or reinforcing a false impression that he had previously been employed by Adecco USA, Inc., and was entitled to receive unemployment insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said RONALD HOBBS then and there well knew, he had never been employed by or received wages from Adecco USA, Inc. and was therefore not entitled to unemployment insurance benefits, contrary to the provisions of

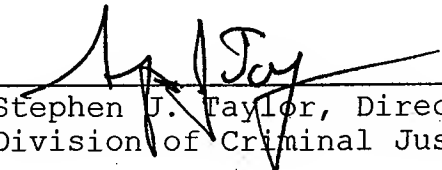
N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2) (a), and N.J.S.A. 2C:2-6,
and against the peace of this State, the government and dignity
of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

RONALD HOBBS

on or about July 7, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark and the Township of Irvington, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 71567985, dated July 5, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 3/1/12

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(15)

Superior Court

Docket Number

12 - 03 - 00046 - S

STATE OF NEW JERSEY)

v.)

RONALD HOBBS)

ORDER OF VENUE

FILED


MAR 08 2012

State Grand Jury Judge

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 15 day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

FILED

RECEIVED

MAR 08 2012

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

MAR 01 2012

State Grand Jury Judge

Judge Pedro J. Jimenez, Jr.

State Grand Jury

Number SGJ614-11-15(5)

Superior Court

Docket Number 12-03-00035-9

STATE OF NEW JERSEY

)

v.

)

INDICTMENT

JIBRIL STOKES

)

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

JIBRIL STOKES

between on or about March 28, 2010, and on or about September 11,
2010, at the City of Trenton, in the County of Mercer, at the
City of Newark, in the County of Essex, elsewhere, and within the
jurisdiction of this Court, did purposely obtain property of the
State of New Jersey, having a value in excess of \$500, by
deception, by creating or reinforcing a false impression that he
had previously been employed by Adecco USA, Inc., and was
entitled to receive unemployment insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said JIBRIL STOKES then
and there well knew, he had never been employed by or received
wages from Adecco USA, Inc. and was therefore not entitled to
unemployment insurance benefits, contrary to the provisions of
N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6,

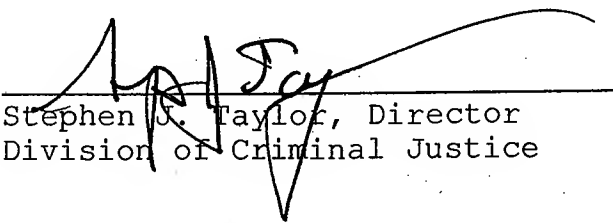
and against the peace of this State, the government and dignity
of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

JIBRIL STOKES

on or about August 19, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 72906214, dated August 13, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date:

3/1/12

FILED

RECEIVED

MAR 08 2012

SUPERIOR COURT OF NEW JERSEY

State Grand Jury Judge LAW DIVISION - CRIMINAL

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

State Grand Jury

Number SGJ614-11-15(5)

Superior Court

Docket Number 12-03-00035-S

STATE OF NEW JERSEY)

v.)


ORDER OF VENUE

JIBRIL STOKES)

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 15th day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(25)

Superior Court

Docket Number 12-03-00056-1

STATE OF NEW JERSEY)

v.)

CHERYL WARREN)

INDICTMENT

FILED

MAR 08 2012

State Grand Jury Judge

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

CHERYL WARREN

between on or about between on or about July 26, 2009, and on or
about June 26, 2010, at the City of Trenton, in the County of
Mercer, at the City of Newark, in the County of Essex, elsewhere,
and within the jurisdiction of this Court, did purposely obtain
property of the State of New Jersey, having a value in excess of
\$500, by deception, by creating or reinforcing a false impression
that she had previously been employed by the University of
Medicine and Dentistry of New Jersey, and was entitled to receive
unemployment insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said CHERYL WARREN then
and there well knew, she had never been employed by or received
wages from the University of Medicine and Dentistry of New Jersey
and was therefore not entitled to unemployment insurance

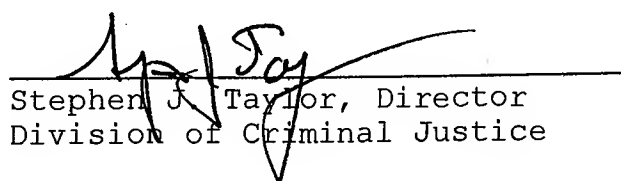
benefits, contrary to the provisions of N.J.S.A. 2C:20-4,
N.J.S.A. 2C:20-2b(2) (a), and N.J.S.A. 2C:2-6, and against the
peace of this State, the government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

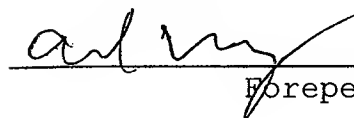
CHERYL WARREN

on or about July 6, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which she did not believe to be true on an Unemployment Insurance Benefit check, number 71525133, dated July 1, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 3/1/12

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(25)

Superior Court

Docket Number 12-03-00056-S

STATE OF NEW JERSEY)

v.)

CHERYL WARREN)

ORDER OF VENUE

FILED

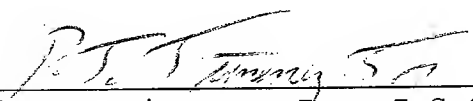
MAR 08 2012

State Grand Jury Judge

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 15 day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

FILED

MAR 08 2012

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(16)

Superior Court

Docket Number 12-05-00047-1

STATE OF NEW JERSEY)

v.)

INDICTMENT

KARRIEM WARREN)

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

KARRIEM WARREN

between on or about March 1, 2009, and on or about June 19, 2010,
at the City of Trenton, in the County of Mercer, at the City of
Newark and the Township of Irvington, both in the County of
Essex, elsewhere, and within the jurisdiction of this Court, did
purposely obtain property of the State of New Jersey, having a
value in excess of \$500, by deception, by creating or reinforcing
a false impression that he had previously been employed by Adecco
USA, Inc., and was entitled to receive unemployment insurance
benefits;

WHEREAS IN TRUTH AND IN FACT, as the said KARRIEM WARREN
then and there well knew, he had never been employed by or
received wages from Adecco USA, Inc. and was therefore not
entitled to unemployment insurance benefits, contrary to the

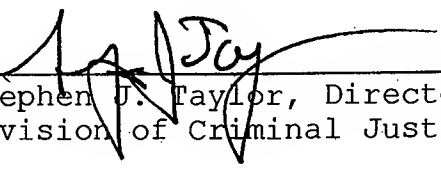
provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and
N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

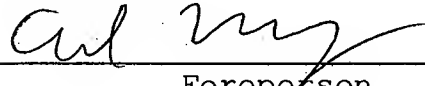
KARRIEM WARREN

on or about March 24, 2009, at the City of Trenton, in the County of Mercer, at the City of Newark and the Township of Irvington, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check number 56823943, dated March 20, 2009, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 3/11/12

FILED

MAR 08 2012

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

State Grand Jury
SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(16)

Superior Court

Docket Number 12-03-00047-8

STATE OF NEW JERSEY)

v.)


ORDER OF VENUE

KARRIEM WARREN)

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

FILED

MAR 08 2012

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

State Grand Jury Judge
SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(17)

Superior Court

Docket Number 12-03-00048-S

STATE OF NEW JERSEY

)

v.

)

INDICTMENT

KALI WARREN

)

The Grand Jurors of and for the State of New Jersey, upon their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

KALI WARREN

between on or about March 15, 2009, and on or about September 11, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark and the Township of South Orange, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, did purposely obtain property of the State of New Jersey, having a value in excess of \$500, by deception, by creating or reinforcing a false impression that he had previously been employed by Newark Beth Israel Medical Center, and was entitled to receive unemployment insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said KALI WARREN then and there well knew, he had never been employed by or received wages from Newark Beth Israel Medical Center and was therefore not entitled to unemployment insurance benefits, contrary to the

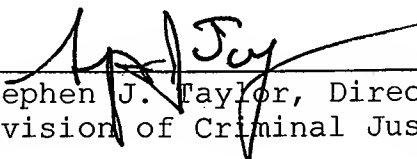
provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and
N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

KALI WARREN

on or about June 24, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark and the Township of South Orange, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 71153491, dated June 21, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date:

3/1/12

FILED

MAR 08 2012

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(17)

Superior Court

Docket Number 12-03-00048-S

STATE OF NEW JERSEY)

v.)

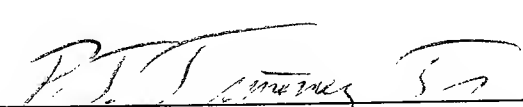
ORDER OF VENUE

KALI WARREN)

An Indictment having been returned to this Court by the
State Grand Jury in the above captioned matter,

IT IS ORDERED on this 10th day of March, 2012,
pursuant to paragraph 8 of the State Grand Jury Act, that the
County of Mercer be and hereby is designated as the County of venue
for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court
shall transmit forthwith the Indictment in this matter and a
certified copy of this Order to the Criminal Division Manager of
the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(18)

Superior Court

Docket Number 2-63-00002-1

STATE OF NEW JERSEY)

v.)

SAMAAD MATHIS)

INDICTMENT

FILED

MAR 08 2012

State Grand Jury Judge

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

SAMAAD MATHIS

between on or about May 17, 2009, and on or about July 10, 2010,
at the City of Trenton, in the County of Mercer, at the City of
Newark, in the County of Essex, elsewhere, and within the
jurisdiction of this Court, did purposely obtain property of the
State of New Jersey, having a value in excess of \$500, by
deception, by creating or reinforcing a false impression that he
had previously been employed by the University of Medicine and
Dentistry of New Jersey, and was entitled to receive unemployment
insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said SAMAAD MATHIS then
and there well knew, he had never been employed by or received
wages from the University of Medicine and Dentistry of New Jersey
and was therefore not entitled to unemployment insurance

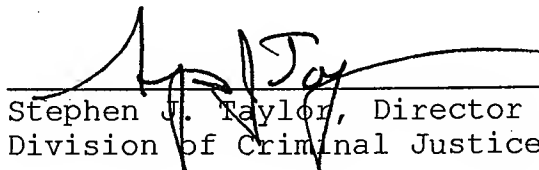
benefits, contrary to the provisions of N.J.S.A. 2C:20-4,
N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the
peace of this State, the government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

SAMAAD MATHIS

on or about July 3, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check number, 71406760, dated June 29, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date:

3/6/12

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(18)

Superior Court

Docket Number 12-03-00042-0

STATE OF NEW JERSEY)

v.)

SAMAAD MATHIS)

ORDER OF VENUE

FILED

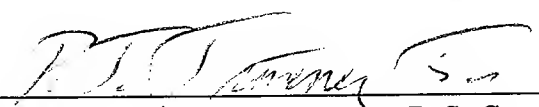
MAR 08 2012

State Grand Jury Judge

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

FILED

MAR 08 2012

RECEIVED

SUPERIOR COURT OF NEW JERSEY
State Grand Jury Judge DIVISION - CRIMINAL

MAR 01 2012

Judge Pedro J. Jimenez, Jr

State Grand Jury

Number SGJ614-11-15(19)

Superior Court

Docket Number 12-03-00050-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

RASJHON WARREN)

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

RASJHON WARREN

between on or about January 17, 2010, and on or about September
11, 2010, at the City of Trenton, in the County of Mercer, at the
City of Newark, in the County of Essex, elsewhere, and within the
jurisdiction of this Court, did purposely obtain property of the
State of New Jersey, having a value in excess of \$500, by
deception, by creating or reinforcing a false impression that he
had previously been employed by Newark Beth Israel Medical
Center, and was entitled to receive unemployment insurance
benefits;

WHEREAS IN TRUTH AND IN FACT, as the said RASJHON WARREN
then and there well knew, he had never been employed by or
received wages from Newark Beth Israel Medical Center and was
therefore not entitled to unemployment insurance benefits,

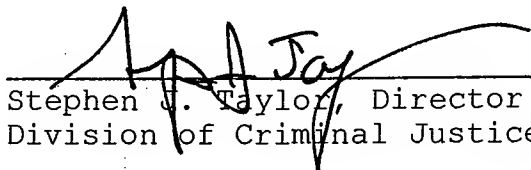
contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

RASJHON WARREN

on or about June 5, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 70517525, dated May 31, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date:



FILED

MAR 08 2012

SUPERIOR COURT OF NEW JERSEY

RECEIVED

State Grand Jury Judge LAW DIVISION - CRIMINAL

MAR 01 2012

State Grand Jury

Number SGJ614-11-15(19)

Judge Pedro J. Jimenez, Jr

Superior Court
Docket Number

12 - 03 - 00050 - S

STATE OF NEW JERSEY)

v.)

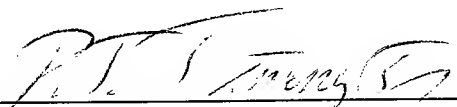
ORDER OF VENUE

RASJOHN WARREN)

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(20)

Superior Court

Docket Number

12-05-00001-0

STATE OF NEW JERSEY

)

v.

)

INDICTMENT

BRIAN ROSS

)

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

BRIAN ROSS

between on or about August 30, 2009, and on or about July 22,
2010, at the City of Trenton, in the County of Mercer, at the
City of East Orange, in the County of Essex, elsewhere, and
within the jurisdiction of this Court, did purposely obtain
property of the State of New Jersey, having a value in excess of
\$500, by deception, by creating or reinforcing a false impression
that he had previously been employed by Adecco USA, Inc., and was
entitled to receive unemployment insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said BRIAN ROSS then
and there well knew, he had never been employed by or received
wages from Adecco USA, Inc. and was therefore not entitled to
unemployment insurance benefits, contrary to the provisions of
N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6,

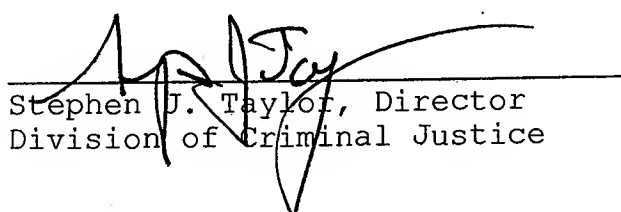
and against the peace of this State, the government and dignity
of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

BRIAN ROSS

on or about July 22, 2010, at the City of Trenton, in the County of Mercer, at the City of East Orange, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 72025082, dated July 19, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 3/6/12

FILED

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

MAR 08 2012 SUPERIOR COURT OF NEW JERSEY

LAW DIVISION - CRIMINAL

State Grand Jury Judge

State Grand Jury

Number SGJ614-11-15(20)

Superior Court

Docket Number 12-05-00051-1

STATE OF NEW JERSEY)

v.)

ORDER OF VENUE

BRIAN ROSS)

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(21)

Superior Court

Docket Number 12-03-00053-8

STATE OF NEW JERSEY)

v.)

RODRIGUEZ SHARPE)

INDICTMENT

FILED

MAR 08 2012

State Grand Jury Judge

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

RODRIGUEZ SHARPE

between on or about August 16, 2009, and on or about October 30,
2010, at the City of Trenton, in the County of Mercer, at the
Cities of Newark and East Orange, both in the County of Essex, at
the City of Somerset, in the County of Somerset, elsewhere, and
within the jurisdiction of this Court, did purposely obtain
property of the State of New Jersey, having an aggregate value in
excess of \$500, by deception, that is, the said RODRIGUEZ SHARPE
purposely did obtain unemployment insurance benefits by
submitting or causing to be submitted applications for
unemployment insurance benefits to the State of New Jersey in the
names of RODRIGUEZ SHARPE and Harold Sorrells, thereby creating
or reinforcing false impressions to the State of New Jersey that
the named applicants were previously employed by Adecco USA,

Inc., and the University of Medicine and Dentistry, respectively, and were entitled to receive unemployment insurance benefits;

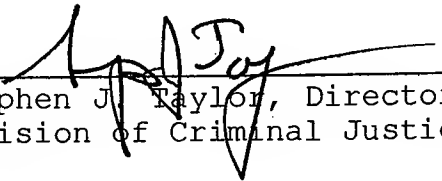
WHEREAS IN TRUTH AND IN FACT, as the said RODRIGUEZ SHARPE then and there well knew, the named applicants had never been employed by or received wages from said employers and were therefore not entitled to unemployment insurance benefits, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

RODRIGUEZ SHARPE

on or about September 25, 2010, at the City of Trenton, in the County of Mercer, at the Cities of Newark and East Orange, both in the County of Essex, at the City of Somerset, in the County of Somerset, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 74140080, dated September 21, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 3/1/12

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(21)

Superior Court
Docket Number

12-03-00052-S

STATE OF NEW JERSEY)

v.)

RODRIGUEZ SHARPE)

ORDER OF VENUE

FILED

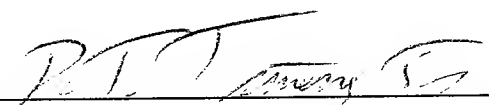
MAR 08 2012

State Grand Jury Judge

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 15 day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

FILED

RECEIVED

MAR 08 2012

MAR 01 2012

State Grand Jury Judge
SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

Judge Pedro J. Jimenez, Jr

State Grand Jury

Number SGJ614-11-15(22)

Superior Court

Docket Number 12-03-00053-S

STATE OF NEW JERSEY)

v.)

INDICTMENT

ROBERT SHEIN)

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

ROBERT SHEIN

between on or about June 20, 2010, and on or about August 7,
2010, at the City of Trenton, in the County of Mercer, at the
City of Newark, in the County of Essex, elsewhere, and within the
jurisdiction of this Court, did purposely obtain property of the
State of New Jersey, having a value in excess of \$500, by
deception, by creating or reinforcing a false impression that he
had previously been employed by the University of Medicine and
Dentistry of New Jersey, and was entitled to receive unemployment
insurance benefits;

WHEREAS IN TRUTH AND IN FACT, as the said ROBERT SHEIN then
and there well knew, he had never been employed by or received
wages from the University of Medicine and Dentistry of New Jersey
and was therefore not entitled to unemployment insurance

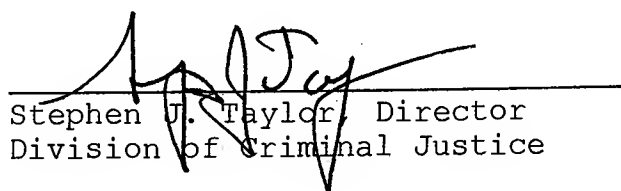
benefits, contrary to the provisions of N.J.S.A. 2C:20-4,
N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the
peace of this State, the government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

ROBERT SHEIN

on or about September 13, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 72906141, dated August 13, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date:

3/1/12

FILED

MAR 08 2012

RECEIVED

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

MAR 01 2012

State Grand Jury

Number SGJ614-11-15(22)

Judge Pedro J. Jimenez, Jr

Superior Court

Docket Number 12-03-00053-S

STATE OF NEW JERSEY)

v.)


ORDER OF VENUE

ROBERT SHEIN)

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(23)

Superior Court

Docket Number

12-03-00054-0

FILED

STATE OF NEW JERSEY)

v.)

EVAN DAVIS WEEMS)

INDICTMENT

MAR 08 2012

State Grand Jury Judge

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

EVAN DAVIS WEEMS

between on or about February 14, 2010, and on or about October
28, 2010, at the City of Trenton, in the County of Mercer, at the
Township of Irvington and at the City of Newark, both in the
County of Essex, elsewhere, and within the jurisdiction of this
Court, did purposely obtain property of the State of New Jersey,
having a value in excess of \$500, by deception, by creating or
reinforcing a false impression that he had previously been
employed by the University of Medicine and Dentistry of New
Jersey, and was entitled to receive unemployment insurance
benefits;

WHEREAS IN TRUTH AND IN FACT, as the said EVAN DAVIS WEEMS
then and there well knew, he had never been employed by or
received wages from the University of Medicine and Dentistry of

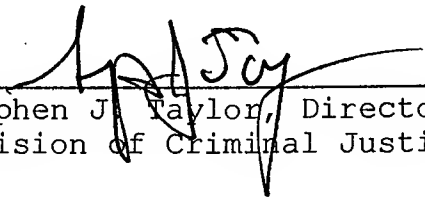
New Jersey and was therefore not entitled to unemployment insurance benefits, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

EVAN DAVIS WEEMS

on or about October 28, 2010, at the City of Trenton, in the County of Mercer, at the Township of Irvington and at the City of Newark, both in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which he did not believe to be true on an Unemployment Insurance Benefit check, number 75220898, dated October 26, 2010, said check bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: _____

3/1/12

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ614-11-15(23)

Superior Court
Docket Number 12-03-00054-0

STATE OF NEW JERSEY)

v.)

EVAN DAVIS WEEMS)

FILED

ORDER OF VENUE

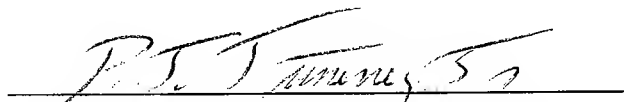
MAR 08 2012

State Grand Jury Judge

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.

FILED

MAR 08 2012

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr

State Grand Jury
SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ614-11-15(24)

Superior Court

Docket Number 2 - 03 - 00055 - 8

STATE OF NEW JERSEY)

v.)

INDICTMENT

TINA YOUNG)

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Theft By Deception - Third Degree)

TINA YOUNG

between on or about March 15, 2009, and on or about September 11,
2010, at the City of Trenton, in the County of Mercer, at the
City of Newark, in the County of Essex, elsewhere, and within the
jurisdiction of this Court, did purposely obtain property of the
State of New Jersey, having a value in excess of \$500, by
deception, by creating or reinforcing a false impression that she
had previously been employed by Newark Beth Israel Medical
Center, and was entitled to receive unemployment insurance
benefits;

WHEREAS IN TRUTH AND IN FACT, as the said TINA YOUNG then
and there well knew, she had never been employed by or received
wages from Newark Beth Israel Medical Center and was therefore
not entitled to unemployment insurance benefits, contrary to the

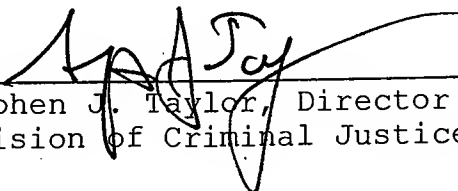
provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(2)(a), and
N.J.S.A. 2C:2-6, and against the peace of this State, the
government and dignity of the same.

COUNT TWO

(Unsworn Falsification to Authorities - Fourth Degree)

TINA YOUNG

on or about June 3, 2010, at the City of Trenton, in the County of Mercer, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, did knowingly make a written false statement which she did not believe to be true on an Unemployment Insurance Benefit check, number 70505452, dated May 31, 2010, said form bearing notice, authorized by law, to the effect that false statements made therein are punishable, contrary to the provisions of N.J.S.A. 2C:28-3a, and against the peace of this State, the government and dignity of the same.



Stephen J. Taylor, Director
Division of Criminal Justice

A TRUE BILL:



Foreperson

Date: 3/1/12

FILED

MAR 08 2012

State Grand Jury Judge SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

RECEIVED

MAR 01 2012

Judge Pedro J. Jimenez, Jr.

State Grand Jury

Number SGJ614-11-15(24)

Superior Court
Docket Number

12-03-00055-S

STATE OF NEW JERSEY)

v.)


ORDER OF VENUE

TINA YOUNG)

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 1st day of March, 2012, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Mercer be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Mercer for filing.


Pedro J. Jimenez, Jr., J.S.C.